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November 28, 2018

VIA FOIAONLINE

Larry Gottesman
National Freedom of Information Officer, (2822T)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Freedom of Information Act Request

Dear Mr. Gottesman:

Pursuant to the Freedom of Information Act (5 U.S.C. § 552), I am requesting copies of the following records:

Any and all documents, correspondence, notes, and memoranda, in U.S. EPA's possession, relating to EPA's use of a "wrongful profits," "illegal competitive advantage," or "beyond BEN benefit (BBB)" civil penalty calculation in a Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) civil judicial case in the last 5 years.

I authorize EPA to spend up to \$500.00 to provide the requested documents. Please contact me if fees will exceed this sum. I would prefer to receive all responsive documents on a CD or DVD. To the extent anything is withheld, please provide a list identifying those materials.

Sincerely,

/s/ Elise N. Paeffgen

Elise N. Paeffgen